

BY HAND

Hon. P. Kevin Castel United States District Judge United States Courthouse 500 Pearl Street, Room 2260 New York, New York 10007-1312

American Steamship Owners v. Dusung Shipping Co. Ltd. 07 CV 6474 (PKC)

Dear Judge Castel:

Re:

We represent the Plaintiff in the above-referenced action involving a maritime attachment under Rule B and write to request that the pre-trial conference scheduled for January 4, 2008 be adjourned 60 days.

Plaintiff filed this action on July 17, 2007 seeking, *inter alia*, to attach the sum of \$394,031 from Defendant Dusung Shipping Co. Ltd. (among other Defendants). On the same day, Your Honor granted Plaintiff's application for the issuance of Process of Maritime Attachment and Garnishment ("PMAG"). On or about August 20, 2007, Plaintiff attached the sum of \$20,000 and Notice of Attachment was provided on the same date to Dusung. Plaintiff has not attached any funds from the other Defendants. To date, Defendants have not appeared in the action or moved to vacate the attachment despite the fact that prior Notices of Pre-Trial Conference have been sent via electronic mail. Plaintiff continues its daily efforts of serving the PMAG upon various New York banks to obtain full security for its claims from all the Defendants.

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As all of the Defendants are domiciled in the Republic of Korea, formal service of process must be performed under the Hague Convention. Plaintiff has today complied with the Hague Convention requirements, namely, translating the Summons, Complaint and the Hague Convention Form into Korean and mailing same to the Korean Central Authority. Upon receipt of the Certificate of Service from the Korean Government we will file same with the Clerk of the Court.

In light of the foregoing, we respectfully request that the Court grant the within application.

We thank the Court for its attention to this matter.

Respectfully yours,

FREEHILL HOGAN & MAHAR LLP

Manuel A. Molina

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